

**Applicant submits that the Examiner has failed to show that Steinder and Gokhale teach each and every element as claimed in the present application.**

### **Claim 1**

The Applicant submits that Steinder and Gokhale fail to disclose, suggest or teach, *inter alia*, at least the following features recited by Claim 1 of the present application:

“...means to form a new identifier for the further interface means, **the new identifier including check data resulting from a hash operation for checking the validity of the or at least part of the new identifier ...**”  
(emphases added)

Applicant has reviewed the cited references with care, paying particular attention to the passages cited to by the Examiner, and is compelled to disagree with the Examiner’s understanding of these references. Applicant submits that the Examiner has misunderstood the teachings of Gokhale for the following reasons. Gokhale discloses a “hashing strategy [that] **uses ... hashing function to locate the object** [and] [a] second ... **hashing function** is then **used to locate the operation**” (emphasis added). See page 4, right hand column, lines 7-10 of Gokhale. Since hashing function in Gokhale is used to find the object and the operation, one skilled in the art would not consider Gokhale as teaching “check data resulting from a hash operation for checking the validity of ... the new identifier” (emphasis added) as recited in Claim 1. /

Applicant submits that the Examiner failed to comply with 37 C.F.R. §1.104(c)(2) which states:

“In rejecting claims for want of novelty or for obviousness, the examiner must cite the best references at his or her command. When a reference is complex or shows or describes invention other than that claimed by Applicant, **the particular part relied on must be designated as nearly as practicable**. The pertinence, if not apparent, must be clearly explained and each rejected claim specified” (emphases added).

Applicant submits that the Examiner has failed to “designate as nearly as practicable” the particular part of Gokhale relied upon in making the assertion that Gokhale teaches

“check data resulting from a hash operation for checking the validity of ... the new identifier” as recited in Claim 1. See page 4, line 4 of the Official Action.

Additionally, the Examiner asserts that “including check data in an identifier [is] ... taught by Gokhale.” See page 4, lines 7-8 of the Office Action. According to the Examiner, an “identifier” as recited in Claim 1 is disclosed by “object key” in Gokhale. See page 4, line 1 of the Office Action. Further according to the Examiner, “check data” as recited in Claim 1 is disclosed by “hash function uses an automatically generated lookup table ... to return a unique hash value for each object key.” See page 4, lines 1-3 of the Office Action. Thus, if the “identifier” is the “object key” and the “check data” is the “hash value” as asserted by the Examiner, where does Gokhale teach, disclose or suggest object key including hash value? Applicant submits that the Examiner has failed to comply with 37 C.F.R. §1.104(c)(2) because the Examiner has failed to “designate as nearly as practicable” the particular part of Gokhale relied upon in making the assertion that Gokhale teaches “identifier including check data” as recited in Claim 1. See page 4, lines 7-8 of the Official Action.

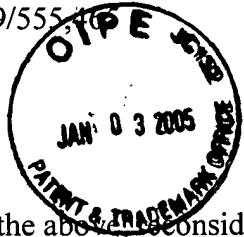
Applicant respectfully reminds the Examiner of the requirements posited by MPEP 2143.03 that “[t]o establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). All words in a claim must be considered in judging the patentability of that claim against the prior art. *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).” (emphasis added) The Examiner has not made, and indeed cannot make, a *prima facie* showing that “the new identifier including check data resulting from a hash operation for checking the validity of the or at least part of the new identifier” is disclosed by Gokhale. Applicant therefore submits that claim 1 is allowable and respectfully requests the Examiner to reconsider and pass the claim to issue.

Claims 2-32 and 34 depend from Claim 1. “If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious.” *In re Fine*, 837 F.2d

1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Therefore, in light of the above discussion of Claim 1, Applicant submits that Claims 2-32 and 34 are also allowable.

### **Claim 33**

The Examiner asserts that Claim 33 is a method claim that corresponds to system Claim 1 and Claim 33 is rejected on the same grounds as Claim 1. The Applicant submits that, at least for the reasons stated above, the Examiner has **not** established a *prima facie* case of obviousness for the claims rejected under 35 U.S.C. §103(a). The Applicant respectfully requests that the rejection be withdrawn. Claim 35 depends from Claim 33. Therefore, in light of the above discussion, Applicant submits that Claim 35 is also allowable.

Conclusion

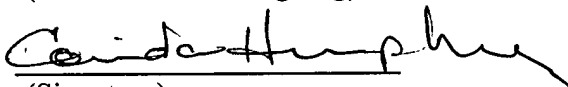
In view of the above, consideration and allowance of all the claims are respectfully solicited.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, then the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136 (a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

I hereby certify that this correspondence is being deposited with the United States Post Office with sufficient postage as first class mail in an envelope addressed to Commissioner for Patents PO Box 1450, Alexandria, VA 22313-1450 on

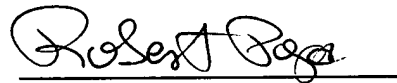
December 27, 2004  
(Date of Deposit)

Corinda Humphrey  
(Name of Person Signing)

  
(Signature)

December 27, 2004  
(Date)

Respectfully submitted,



Robert Popa  
Attorney for Applicants  
Reg. No. 43,010  
LADAS & PARRY  
5670 Wilshire Boulevard, Suite 2100  
Los Angeles, California 90036  
(323) 934-2300